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Defendants San Mateo County Board of Supervisors submit this response to Sheriff 1 2 Corpus's Administrative Motion to Seal filed July 18, 2025. Sheriff Corpus filed this motion 3 under seal and did not serve it upon Defendants. See ECF 13. Defendants therefore do not know 4 the Sheriff's basis or reasoning for requesting sealing. 5 Defendants understand that the motion only seeks to seal Exhibits 12 and 14 to the 6 Declaration of WS Wilson Leung, as indicated by the Sheriff's re-filing of that declaration. See 7 ECFs 14–15. Although Defendants previously sought to avoid public disclosure of some 8 information in these documents to protect the privacy rights of third parties, the Sheriff has since 9 publicly filed both of these documents she now seeks to seal in separate proceedings in San 10 Mateo Superior Court. See Notice of Lodging and Lodging of Exhibits Volumes One through 11 Four, Sheriff Christina Corpus v. Cnty. of San Mateo Bd. of Supervisors, No. 25-CIV-04319 (Cal. 12 Super. Ct. Jun 27, 2025), available at https://odyportal-ext.sanmateocourt.org. As far as 13 Defendants are aware, Sheriff Corpus has not taken any measures in that proceeding to remove 14 them from the public docket, where they remain to this day. Id. After the documents were filed on 15 the public docket, they were also published in their entirety in the press. See, e.g., Dave Price, 16 Confidential Documents in Sheriff Corpus Case posted on Court Website, PALO ALTO DAILY 17 Post (Jul. 2, 2025), https://padailypost.com/2025/07/02/confidential-documents-in-sheriff-18 corpus-case-posted-on-court-website/. 19 20 Dated: July 22, 2025 KEKER, VAN NEST & PETERS LLP 21 /s/ Jan Nielsen Little By: 22 JAN NIELSEN LITTLE ANDREW F. DAWSON 23 FRANCO MUZZIO 24 Attorneys for Defendants DAVID CANEPA, NOELIA CORZO, 25 JACKIE SPEIER, RAY MUELLER, and LISA GAUTHIER 26 27 28